

# HUD Master Models

Private Enforcement Initiative

## FHIP-PEI

### Private Enforcement Initiative

To assist private, tax-exempt Fair Housing organizations in the investigation and enforcement of alleged violations of the Fair Housing Act and substantially equivalent State and local Fair Housing laws.

### Need Statements

There is a need for investigating systematic violations of the Fair Housing Act or substantially equivalent State and Fair Housing local laws.

There is a need for enforcement of violations of the Fair Housing Act and substantially equivalent State and local Fair Housing laws.

### Activities and Outputs

Accessibility tests lead to litigation	Tests
Accessibility Workshops attendance	Persons
Accessibility Workshops conducted	Workshops
Allegations litigated	Litigations
Allegations mediated	Mediations
Analyze internet tests	Tests
Assess FHAA case merit	Complaints
Assist clients requesting reasonable accommodation/modification	Persons
Attorney Referral System	Attorneys
Audits	Audits
Businesses whose business practices were analyzed	Businesses
Case management services	Persons
Case meetings w/attorneys	Meetings
Complaint inquiries	Persons
Complaint intake and/or process	Intakes
Complaints filed	Persons
Complaints filed to partner agency	Complaints
Complaints filed Zoning	Complaints
Complaints filed Zoning – Disability Issues	Complaints
Complaints filed/referred to HUD	Complaints
Complaints investigated Zoning	Complaints
Complaints investigated Zoning – Disability Issues	Investigations
Complaints referred to attorneys	Complaints
Contact media when violations identified	Contacts
Counseling for complaints by immigrants	Complaints
Develop protocol for referrals	Protocol
Develop tracking for referrals	Referrals
Direct mailings to underserved households	Households
Documents translated for non-English speakers	Documents
Draft HUD complaints	Complaints
Enforcement proposals filed	Filings
Enforcement proposals filed w/HUD	Proposals
Evaluate/Revise test methodology	TestsMethodology's
Expert witnesses procured	Persons
Fair Housing assessments	Assessments
Fair housing education/training	Persons
Fair housing education/training for disabled	Persons
Fair housing law & enforcement training/education	Persons
Favorable pre-filing closings	Complaints
FH Counseling	Persons
Litigation	Litigation
Market research prior to testing	Results of Research
Mediation	Mediation

Meetings w/building trade & architectural groups	Meetings
Meetings w/local groups	Meetings
Monitor settlement agreements	Agreements
Monitor zoning changes	Monitoring
Mortgage/lending test conducted	Tests
Non-English speakers receive translated fair housing materials	Persons
Outreach & education	Persons
Paired tests – Administered test	Persons
Partnerships w/fair housing orgs	Partnerships
Partnerships w/local agencies/orgs	Partnerships
Partnerships w/local government	Partnerships
Partnerships with FHAPs	FHAPs
Persons assisted – Disabled	Persons
Persons assisted – Non-disabled	Persons
Phone assisted – Disabled	Persons
Phone assisted – Non-disabled	Persons
Phone tests conducted	Tests
Predatory lending complaints accepted for intervention prevention	Complaints
Property searches	Persons
Provide website	Hits to website
Publications distributed to recipients	Persons
Recruit student interns	Persons
Recruit testers	Persons
Rental complaints intake and/or processed	Complaints
Retest sites	Sites
Sessions/training for non-English speakers	Sessions
Site Assessments	Assessments
Site tests conducted	Tests
Speaking engagements	Events
Speaking engagements attendance	Persons
Staff training	Persons
Targeted investigations	Investigations
Test site visits – Zoning	Visits
Test site visits – Zoning – # of Persons impacted at the census	Persons
Test site visits – Zoning – # of Persons impacted at the census tract(s) level	Persons
Test site visits – Zoning – Disability issues	Visits
Test site visits – Zoning – Disability issues - # of persons impacted at the census tract(s) level	Persons
Test sites identified	Sites
Testing and evaluation testers trained	Evaluation
Tests retested	Tests
Tests show differential treatment	Tests
Train student interns	Persons
Train testers	Persons
Volunteer help	Persons
Witnesses interviewed	Persons
Other	Other

### **Outcomes and Indicators**

Attorney's fee received	Dollars
Cases resolved	Persons
Cases resolved to benefit client	Persons
Client damages received via FHAP or litigations	Dollars
Clients indicate use of PEI program as a result of direct mailings to underserved households	Persons
Clients indicate use of PEI program as a result of received publications	Persons
Clients indicate use of PEI program as a result of attending meetings or presentations	Persons
Clients indicate use of PEI program as a result of educational programs	Persons
Clients obtain safe affordable housing	Persons
Clients retain safe affordable housing	Persons
Complaints – Zoning – # of Persons impacted by favorable Zoning changes at the census tract(s) level	Persons
Complaints – Zoning Disability issues – # of Persons impacted by favorable Zoning changes at the census tract(s) level	Persons
Complaints closed with advice	Complaints

Develop protocol for referrals	Protocols
Dollar value of the purchased home	Dollars
Dollar value of the rental property obtained	Dollars
Dollar value of the settlement	Dollars
Housing Units opened up from discrimination	Units
Paired test indicates denial of reasonable accommodations	Persons
Paired test indicates denial of reasonable modifications	Persons
Paired test indicates unfair treatment based upon color	Persons
Paired test indicates unfair treatment based upon religion	Persons
Paired test indicates unfair treatment based upon sex	Persons
Paired test indicates unfair treatment based upon chemical sensitivity	Persons
Paired test indicates unfair treatment to American Indians	Persons
Paired test indicates unfair treatment to Asians	Persons
Paired test indicates unfair treatment to Blacks	Persons
Paired test indicates unfair treatment to families with children	Persons
Paired test indicates unfair treatment to Hispanic	Persons
Paired test indicates unfair treatment to persons with mental disabilities	Persons
Paired test indicates unfair treatment to persons with physical disabilities	Persons
Paired test indicates unfair treatment to Whites	Persons
Requests for accommodations/modification granted	Persons
Use tracking system for referrals	Referrals
Other	Other

### ***Measurement Tools***

<b>A. Tools to Track Outputs and Outcomes</b>
Bank accounts
Construction log
Database
Enforcement log
Financial aid log
Intake log
Interviews
Mgt. Info. System-automated
Mgt. Info. System-manual
Outcome scale(s)
Phone log
Plans
Pre-post tests
Post tests
Program specific form(s)
Questionnaire
Recruitment log
Survey
Technical assistance log
Time sheets
Other
<b>B. Where Data are Maintained</b>
Agency database
Centralized database
Individual case records
Local precinct
Public database
School
Specialized database
Tax Assessor database
Training center
Other

<b>C. Source of Data</b>
Audit report
Business licenses
Certificate of Occupancy
Code violation reports
Counseling reports
Employment records
Engineering reports
Environmental reports
Escrow accounts
Financial reports
GED certification/diploma
Health records
HMIS
Inspection results
Lease agreements
Legal documents
Loan monitoring reports
Mortgage documents
Payment vouchers
Permits issued
Placements
Progress reports
Referrals
Sale documents
Site reports
Statistics
Tax assessments
Testing results
Waiting lists
Work plan reports
Other
<b>D. Frequency of Data Collection</b>
Daily
Weekly
Monthly
Quarterly
Biannually
Annually
Upon incident
Other
<b>E. Process of Collection and Reporting</b>
Computer spreadsheets
Flat file database
Manual tallies
Relational database
Statistical database
Other

**Evaluation Process – These are standard requirements that HUD will expect every program manager receiving a grant to do as part of their project management.**

- An evaluation process will be part of the on-going management of the program.

- Comparisons will be made between projected and actual numbers for both outputs and outcomes.
- Deviations from projected outputs and outcomes will be documented and explained.
- Analysis of data to determine the relationship of outputs to outcomes; what outputs produce which outcomes.

**HUD Will Use The Following Management Questions To Evaluate Your Program**

1. How many clients were served during the period of performance?
2. Of those served how many resulted in cases?
3. How many cases were resolved?
4. How many cases were resolved to the benefit of the client?
5. How many zoning complaints were resolved in favor of the client?
6. How many estimated persons were favorably impacted by zoning changes?
7. How many persons obtained safe affordable housing?
8. How many persons retained safe affordable housing?
9. What was the dollar value of settlements?
10. What was the dollar value of purchased homes?
11. What was the dollar value of rental properties obtained?
12. How many new fair housing clients were served?
13. How many new fair housing clients were served as a result of education and outreach efforts?
14. What were the top three outreach and education efforts that resulted in new clients to your program, e.g., direct mailings to underserved households, distribution of publications, attendance at a meeting or presentation, attendance at an educational program.
15. How many disability-related cases were resolved to the benefit of the client?
16. How many disability-related zoning cases were resolved in favor of the client?
17. How many persons with disability obtained affordable housing?
18. How many persons with disability retained affordable housing?
19. What was the average amount of allocated PEI funding used per complaint referred to FHIP's and HUD?

**Carter-Richmond Methodology**

The above Management Questions developed for your program are based on the Carter-Richmond Methodology<sup>1</sup>. A description of the Carter-Richmond Methodology appears in the General Section of the NOFA.

1© The Accountable Agency – How to Evaluate the Effectiveness of Public and Private Programs,” Reginald Carter, ISBN Number 9780978724924.